

Carol Lumb - Comments on City of Tukwila draft updated Shoreline Master Program

From: "Padvorac, Andy"
To: "David Radabaugh"
Date: 10/15/2010 4:58 PM
Subject: Comments on City of Tukwila draft updated Shoreline Master Program
CC: "Carol Lumb" , , "Melton, Tina" , "Olson, Cody R"
Attachments: "Carol Lumb" , , "Melton, Tina" , "Olson, Cody R"

Dear David,

Thank you for this opportunity to provide comments on the proposed Tukwila Shoreline Master Program Update, Draft dated December 14, 2009 with subsequent amendments. Puget Sound Energy (PSE) would like to take this opportunity to congratulate the City of Tukwila (City) in drafting a document that meets the intent of the new Department of Ecology Shoreline Guidelines.

PSE has very specific interests in any new shoreline policies and regulations. The criticality of PSE's 230 kV overhead transmission line that passes through the shoreline area just north of I-405 makes it important to use this opportunity to clarify sections of the SMP. PSE maintains similar corridors through more than a hundred jurisdictions in Washington State. Some of these utility corridors cross through sensitive areas, others cross through shoreline jurisdictions. PSE maintains both transmission and distribution lines along many of these corridors. In PSE's electrical system, lines operated at or above 115 kV are referred to transmission lines while lines at lower voltages are distribution lines. In this letter, both will be referred to as "powerlines."

Vegetation maintenance is a necessary part of powerline construction and subsequent maintenance programs, allowing PSE to provide the public with service reliability. Maintenance encompasses the "right tree in the right place" idea and includes pruning, topping, removing and replanting. PSE's objectives for vegetation maintenance along powerlines located within the City of Tukwila are to:

1. Comply with applicable local municipal codes and state and federal regulations and
2. Ensure service continuity, essential for domestic use and vital public services.

To accomplish the above objectives, PSE must maintain necessary clearances between vegetation and powerlines. Properly maintained right-of-ways are essential to providing safety for PSE customers and workers, minimize tree-related outages and for timely restoration of service during emergency conditions and is mandated by the Washington Administrative Code and National Electric Safety Code. While this has always been so, new federal regulations in the last several years have introduced significant financial penalties for when utilities fail to maintain adequate clearances under certain transmission lines. The North American Electric Reliability Corporation (NERC) has adopted more restrictive vegetation maintenance standards for electric transmission lines 200 kilovolts (kV) or higher. The standards are designed to reduce tree related transmission system outages that could impact customers locally as well as across regional and interstate areas.

The focus of PSE's comments regarding the City's SMP update is about provisions for vegetation maintenance under utility powerlines. We are pleased with the extent to which the City's SMP update recognizes the need for utilities to maintain vegetation under powerlines. That maintenance work involves pruning, topping and removing vegetation, and sometimes replacing trees with lower growing vegetation that will not interfere with or create hazardous situation of limbs coming too close to powerlines.

Attached is a document with the code section citations that we request that Ecology review and request that the City change:

1. Clarification of "imminent hazard" relative to vegetation and overhead power lines
2. Tree diameters in determining replacement ratios
3. Tree replacement ratios for tree topping verses tree removal
4. Allowed Tree Height underneath overhead power lines
5. Exemption for pruning trees underneath overhead power lines
6. Incidental edits

PSE recognizes the sensitivity and importance of maintaining vegetation within the shoreline environment. And we have previously discussed with the City our intention to work cooperatively with them in this matter. PSE is preparing to submit permit applications to the city for a comprehensive vegetation maintenance plan along our 230 kV powerlines. The plan will propose pruning or topping some trees and removing others, and on-site restoration as well as off-site replanting and mitigation. After the initial topping and removals, PSE will conduct maintenance along the corridor every few years, consistent with a comprehensive vegetation maintenance plan.

We have already started discussions with the City about the development of such a plan for Tukwila. An important element of the proposed plan will be consistency and predictability. Therefore, it will be important that the City approval process for this on-going maintenance work is straightforward and does not require additional mitigation work beyond what will be identified within a plan. As we begin that process of developing this plan, we are hopeful that the City can clarify the SMP regulations by which we can cooperatively develop such a maintenance plan.

We look forward to working together with Ecology and City staff to clarify these points of the proposed SMP update.

Thank you for the opportunity to submit these comments. We look forward to working with you on this specific issue.

Sincerely,

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